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From: paul@chartrandimports.com%inter2 [paul@chartrandimports.com] on behalf of paul@chartrandimports.com
Sent: Tuesday, August 16, 2005 3:12 PM
To: National List
Subject: PUBLIC COMMENT-Sunset of National List Substances

Mr. Arthur Neal
Program Administration
USDA National Organic Program
Washington, DC

Dear Mr Neal:

I am writing to offer my Public Comment regarding the sunset of substances currently authorized on the NOP National List which are scheduled to expire on 10/21/07, specifically the use of sulfur dioxide in wine from organic grapes, as provided for on the current National List. I am an importer and wholesaler of wines made from organic grapes and have been for 20 years. Our company, Chartrand Imports, sells both wines from organic grapes made with AND WITHOUT added sulfur dioxide.

In addition, I closely followed and participated in many USDA and NOSB discussions on this substance over the last 15 years.

I firmly believe the current allowance for use of sulfur dioxide in wine from organic grapes is both sufficient and necessary for this segment of the organic foods industry to survive and prosper, and to allow the largest segment of US customers to obtain and enjoy wines made with organic grapes. This growth encourages more farming of organic grapes and more acreage under organic production, which is the goal of the OFPA.

The reasons for this usage today are the same reasons that USDA allowed sulfur dioxide on the current National List and why Congress even amended the OFPA in order to clarify that this substance would be allowed despite a seeming contradiction in the original OFPA text.

There has been no other substance identified, organic or synthetic, that eliminates the threat of oxidation and bacterial spoilage in wines once they are bottled. Sulfur in some form has been used as a cleansing and processing additive in winemaking for over 100 years and may indeed have been used for several centuries. It is essentially a natural additive and does no harm to the earth or humans, unless they are allergic to sulfur. Thus sulfur dioxide continues to meet the criteria for placing a substance on the National List.

Although some wines from organic grapes are made without added sulfur, the majority of wines from organic grapes continue to utilize this substance to preserve varietal aromas and stability. The wines made without added sulfur dioxide are more fragile and often disappointing to customers and critics in the wine community. This burden has inhibited acceptance of all wines from organic grapes. Years of effort to produce and market clean, stable and correct wines from organic grapes, using added sulfur dioxide, have led to the current state of growth in such wines. In addition, a greater variety of wines from organic grapes, now available through the use of sulfur dioxide, has led to a much greater acceptance of such wines in the marketplace. This has led to more acres of organic grapes and more customers who look for such wines. Indeed, virtually ALL imported wines from organic grapes contain added sulfur dioxide as this ingredient is used throughout Europe and other wine producing countries in wines from organic grapes.

If the use of sulfur dioxide is terminated in wines from organic grapes, this industry will take a giant step backward. Many, many labels of currently enjoyed wines will not be allowed to state that they contain organic grapes. And many of these wines will stop using organic grapes since they will not be permitted to tell the public anything about

the organic grapes which make up 99.99% of the end product. These wines do not currently use the term "organic wine" and we are not asking for this step. To simply continue to tell the public that such wines do indeed contain certified organic grapes is all that the industry requests by continuing to place sulfur dioxide on the National List.

No replacement has been found, the ingredient still meets the criteria for the National List, and the organic wine grape industry has grown considerably through the widespread availability and sale of both wines with and without added sulfur dioxide. Please contact me if you have any questions in this matter.

Sincerely,

Paul Chartrand, President

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